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October 11, 2024

**VIA - ECF**

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
404 East State Street  
Trenton, NJ 08608

**Re: Johnson & Johnson Talcum Power Products, Marketing, Sales Practices and  
Products liability Litigation  
Case No.: 3:16-md-02738-MAS-RLS**

Dear Judge Shipp:

I write to update you regarding the ongoing impact of *In re Red River Talc, LLC*, case number 24-90505, now pending before the Hon. C. Lopez, U.S. Bankruptcy Court, Southern District of Texas, Houston Division ("Bankruptcy Court"). Most pertinent for your immediate purposes, the original deadline for the defense reply brief on our motion for summary judgment passed while the bankruptcy court's administrative stay was in place. That stay will expire by its own terms tonight. However, the Bankruptcy Court yesterday announced that it will schedule a hearing next week to both hear argument/evidence and announce a decision on the Debtor's pending application for a temporary restraining order ("TRO") of all further litigation that may adversely impact the debtor's estate, which includes all claims that use of Johnson & Johnson's talc-based products resulted in ovarian and gynecological cancer. If granted, the TRO would further stay all action in this matter for most if not all defendants, and in particular, the Johnson & Johnson Defendants.

**We therefore propose to file our reply brief, if needed, on Wednesday of next week or one business day following the hearing (should it be scheduled for Wednesday).**

Honorable Michael A. Shipp

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October 11, 2024

Thank you for your continued consideration of these matters.

Respectfully submitted,

Faegre Drinker Biddle & Reath



Susan M. Sharko

SMS

cc: All counsel via ECF

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**SO ORDERED** on this 16th day of October 2024,

  
MICHAEL A. SHIPP  
UNITED STATES DISTRICT JUDGE

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